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Attorneys for Federal Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

OREGON NATURAL DESERT ASS’N and
AUDUBON SOCIETY OF PORTLAND,

No. 3:12-cv-596-MO

Plaintiffs,

v.

JOINT STATUS REPORT

RYAN ZINKE, Secretary of the Interior and
BUREAU OF LAND MANAGEMENT,

Defendants,

and

COLUMBIA ENERGY PARTNERS, LLC,

Intervenor-Defendant,

and

HARNEY COUNTY,

Intervenor-Defendant.

Pursuant to the Court's November 30, 2017 Order [119], Plaintiffs and Federal Defendants ("the Parties") hereby submit their status report outlining the progress made toward the potential settlement of Plaintiffs' claim for fees and respectfully requesting a further stay through February 23, 2018, while the Parties continue to explore whether they can resolve the claims without further litigation.

Since the last joint status report, the Parties have reviewed and exchanged further written proposals. On January 26, 2018, undersigned counsel for Plaintiffs communicated a proposal for settlement with Federal Defendants' counsel. Federal Defendants will need additional time to evaluate the proposal. As such, the Parties respectfully request that this Court grant an additional stay of proceedings, through February 23, 2018, while they continue to explore whether they can resolve this case without further litigation.

Plaintiffs also state that if it appears the government will shut down on February 8, 2018, counsel for the Plaintiffs will seek to work with counsel for Federal Defendants to file a joint status report prior to any shutdown.

DATED this 29th day of January, 2018.

Respectfully submitted,

s/ Peter M. Lacy

Peter M. Lacy
Oregon Natural Desert Association

Of Attorneys for Plaintiffs

s/ Dedra S. Curteman

Dedra S. Curteman
U.S. Department of Justice

Of Attorneys for Federal Defendants